

## REMARKS

Claims 1-18 are pending in the application. Claims 1-14 have been withdrawn. Claims 15-18 have been rejected: Claims 15 and 16 have been rejected under 35 U.S.C. § 102(e); and Claims 17 and 18 have been rejected under 35 U.S.C. § 103(a).

Claim 15 has been amended, and new Claims 19-23 have been added. In view of the above amendments and the following remarks, applicants submit that all claims are now in condition for allowance.

### Rejections Under 35 U.S.C. § 102(e)

Claims 15 and 16 have been rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,447,037, issued to Crouch ("Crouch").

Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention. Because Crouch fails to teach or suggest each and every element of the invention as recited in Claims 15 or 16, applicants respectfully submit that Crouch is not anticipatory.

Independent Claim 15, as currently amended, recites a method of using a coupling device for providing redundant attachment between an arm of a user and a device having a closed handle. The method includes obtaining a coupling device having first and second ends, the first end including a first loop defining a first opening and the second end including a second loop defining a second opening, *wherein the first opening is sized to be smaller than the second opening*. The method further includes routing the first loop through the closed handle, inserting the second loop through the first opening, and pulling the second loop through said first opening to tighten said coupling device to the closed handled device. Dependent Claim 16 depends from Claim 15.

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Crouch generally describes a method and device for using a coupling device for gathering and carrying a plurality of bags with handles. *See* Crouch, at Col. 4, lines 1-12. The device 10 comprises a strap 12 having an elongated body 14, the opposite ends 16 and 18 of which are configured as closed loop portions 20, each closed loop portion 20 defining an opening. *See* Crouch, at Col. 3, lines 22-27.

Applicants respectfully submit that Crouch fails to teach or suggest each and every element of amended Claim 15 because Crouch fails to teach or suggest "wherein the first opening is sized to be smaller than the second opening," as recited in amended Claim 15. Contrariwise, referring to Crouch, at FIGURE 1 and Col. 3, lines 42-52, the openings 22 are of substantially similar size.

As shown in FIG. 1, the strap 12 is formed by folding the opposite free ends of the band-like material to a *common medial location* along the length of the strap body 14, preferably at the lengthwise center point thereof at 24, at which the free ends of the band are sewn to the body 14 thereby forming the loop portions 20 to be *of substantially the same configuration and dimension*. Optimally, the loop portions 20 are of a sufficient size for substantially any user's hand to be inserted therethrough but, for safety reasons, sufficiently small that the loop portions 20 will not pass over the head of a small child.

Thus, contrary to Claim 15, Crouch teaches loop portions that are of substantially the same configuration and dimension. For this reason, applicants respectfully submit that Claims 15 and 16 are not anticipated by Crouch, and should thus be found allowable.

#### Rejections Under 35 U.S.C. § 103(a)

Claims 17 and 18 have been rejected under 35 U.S.C. § 103(a) as being obvious over Crouch, combined with U.S. Patent No. 6,216,319, issued to Elkins ("Elkins").

To establish a prima facie case of obviousness, all of the claim limitations must be taught or suggested by the prior art. Applicants respectfully submit that neither Crouch nor Elkins,

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either individually or in combination, teach or suggest all of the claim limitations, as recited in Claims 17 or 18, both of which depend from Claim 15.

The Office Action admits that Crouch fails to teach a coupling device including a size adjustment collar slidably coupled to the second loop. The Office Action states, however, that Elkins teaches a coupling device 10 for providing redundant attachment between an arm of a user and a device 30, including a loop 14 defining an opening, and a size adjustment collar 16 slidably coupled to the loop. The Office Action concludes that it would have been obvious to one having ordinary skill in the art at the time the invention was made to have the size adjustment collar slidably coupled to the loop, to adjust the loop to the user's wrist.

Claims 17 and 18 depend from Claim 15, recited above. As discussed above with regard to Claim 15, Crouch fails to teach two loop openings, wherein "the first opening is sized to be smaller than the second opening," as recited in amended Claim 15. Elkins fails to cure this deficiency in Crouch. In fact, referring to FIGURES 1 and 5, Elkins teaches only one loop in the lanyard. For this reason, applicants respectfully submit that Claims 17 and 18 are not obvious in view of Crouch or Elkins, either alone or in combination. And, therefore, these claims should now also be found allowable.

#### New Claims 19-23

Applicants respectfully submit that new Claims 19-23 are also in condition for allowance.

#### CONCLUSION

In view of the foregoing remarks, applicants respectfully request reconsideration of the present application. Applicants respectfully submit that all claims in the present application

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should now be found allowable. The Examiner is invited to telephone the undersigned if there are any remaining issues.

Respectfully submitted,

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Date: 2/3/2006

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